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**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF UTAH  
CENTRAL DIVISION**

**IN RE:**

**CASE: 17-22267**

ANGELETA ANGELO A  
MASON-TRIPLETT-ROGUE

**CHAPTER 13**

**Hon. JOEL T. MARKER**

**Debtor**

Hearing: 01/10/2018

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**TRUSTEE'S RESPONSE TO DEBTOR'S OBJECTION TO MOTION TO DISMISS,  
MOTION TO ABATE AND REQUEST FOR ATTORNEY FEES**

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The Chapter 13 Trustee, by and through counsel, hereby responds to the above-referenced Motion as follows:

1. Trustee objects to the denial of his Motion to Dismiss unless the Debtors are current in plan payments no later than January 10, 2018. As of December 18, 2017, the delinquency is \$1,749.00 (2.80 @ \$625.00 - See Exhibit A).
2. Trustee requests language to be included in the order that if the Debtor(s) fail to cure any portion of the delinquent payments, the Trustee may file a Declaration of Non-Compliance and this case will be dismissed without further notice or hearing.
3. The Trustee objects to any abatement "in the Debtor is not completely current on all plan payments" as no creditors have received notice of this Motion.

4. The Trustee objects to denial of the Motion to Dismiss unless the Debtor also make their December 25, 2017 payment which is due prior to the hearing set, for a total amount to be cured of \$2,374.

5. Unless a fee application is filed, the Trustee objects to an Order granting fees and costs because the Motion does not comply with 11 U.S.C. § 330 or Fed. R. Bankr. P. 2016.

Dated: December 18, 2017

LAJ /S/  
LON A. JENKINS  
CHAPTER 13 TRUSTEE

CERTIFICATE OF MAILING

The undersigned hereby certifies that true and correct copy of the foregoing Trustee's Motion to Dismiss was served upon all persons entitled to receive notice in this case via ECF notification or by U.S. Mail to the following parties on December 18, 2017:

LINCOLN LAW, LOU GEHRIG HARRIS, ESQ., ECF Notification

/s/ Michelle Moses

**EXHIBIT "A"**  
**Trustee's Accounting of Receipts as of December 18, 2017 for Case No. 17-22267**

<u>Date</u>	<u>Payment Type</u>	<u>Amount</u>	<u>Date</u>	<u>Payment Type</u>	<u>Amount</u>
4/19/17	LOCKBOX DEBTO 00000245100038	\$113.00			
4/27/17	LOCKBOX DEBTO 00000245160024	\$300.00			
5/24/17	LOCKBOX DEBTO 00000245439871	\$314.00			
6/12/17	LOCKBOX DEBTO 00000245562411	\$100.00			
6/29/17	LOCKBOX DEBTO 00000245764701	\$125.00			
7/13/17	LOCKBOX DEBTO 00000245911711	\$125.00			
7/25/17	LOCKBOX DEBTO 00000245978370	\$125.00			
8/11/17	TFS - Delinquency C -	\$250.00			
8/25/17	TFS - Monthly Plan	\$125.00			
9/1/17	TFS - Monthly Plan	\$125.00			
9/11/17	TFS - Monthly Plan	\$125.00			
9/22/17	TFS - Monthly Plan	\$125.00			
10/6/17	TFS - Monthly Plan	\$125.00			
10/23/17	TFS - Monthly Plan	\$125.00			
11/20/17	TFS - Monthly Plan	\$125.00			
12/12/17	TFS - Monthly Plan	\$200.00			
12/15/17	TFS - Monthly Plan	\$300.00			